

LPDES PERMIT NO. LA0110868, AI NO. 51974, ACTIVITY NO. PER20040001

LPDES STATEMENT OF BASIS AND RATIONALE
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF THE STATE OF LOUISIANA

COMPANY/FACILITY: Colonial Pipeline Company
 Lookout, Louisiana Remediation Site
 1476 Highway 61
 Jackson, LA 70748

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
 Office of Environmental Services
 Post Office Box 4313
 Baton Rouge, Louisiana 70821-4313

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DATE PREPARED: October 20, 2006

1. PERMIT STATUS

- A. Reason For Permit Action:
 Reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.2301.F, 4901, and 4903.

- B. LPDES Permit: LA0110868
 LPDES permit effective date: 4/01/2000
 LPDES permit expiration date: 3/31/2005
- C. LWDPS Permit: N/A
 LWDPS permit effective date: N/A
 LWDPS permit expiration date: N/A
- D. Date Application Received: 10/01/2004

2. FACILITY INFORMATION

- A. LOCATION – approximately 7,000 feet west of the intersection of LA Highway 43 and Parish Road 89, St. Helena Parish.
 (Latitude: 30 deg., 58 min., 37 sec. Longitude: 90 deg., 43 min., 36 sec.)
- B. FACILITY TYPE/ACTIVITY – Per the application, this is an existing groundwater remediation site associated with a refined petroleum pipeline. This remediation

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project was initiated due to a gasoline leak from a 36-inch diameter pipeline discovered in December 1997. This pipeline (which has, in the past, transported unleaded & leaded gasoline, diesel fuel, and kerosene) was found to be leaking gasoline approximately 6 to 8 feet below grade. Gasoline is the only known product released, and the volume reported released was in excess of 10,000 barrels. A system of recovery wells and groundwater seep interceptor trenches operates to capture and treat ground water containing gasoline. Recovered liquids are managed by separation to recover gasoline for recycle, treating ground water containing gasoline-related constituents, and thermally destroying hydrocarbon vapors. Recovered ground water is treated by liquid/vapor separation, gasoline/water separation, air stripping, granular activated carbon adsorption, and thermal destruction prior to discharge (by effluent pipe) through Outfall 001, into an onsite private manmade pond. The onsite installed spray irrigation system helps to maintain control of the pond water level (if needed). The onsite spray irrigation system is not operated during heavy rainfalls.

The roofed storage tank containment area houses two 10,000 gallon storage tanks (steel-covered, kept in steel secondary containment boxes) to store the recovered gasoline until it can be transported offsite for recycle. Hydrocarbon drums (if any) are stored in a concrete secondary containment structure. All materials are kept or managed in covered tanks or covered process equipment areas. Therefore, there is no more potentially contaminated stormwater runoff from the above ground storage tank containment area.

No commingling of untreated ground water and stormwater occurs.

Any wastes generated as a result of onsite remediation activities, or maintenance/cleaning of the water treatment system, are characterized, stored, and treated/disposed of properly.

C. FEE RATE

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC Code: 4613

3. RECEIVING WATERS

- A. Stream: Darling Creek (via an onsite private manmade pond and onsite spray irrigation system)
- B. Basin and Subsegment: Lake Pontchartrain Basin, Subsegment 040301
- C. Designated Uses: Primary contact recreation, secondary contact recreation, fish and wildlife propagation, and outstanding natural resource waters.

4. OUTFALL INFORMATION

Outfall 001

- A. Discharge Type: Treated groundwater, from this groundwater remediation site, from the groundwater treatment system area.

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- B. Treatment: Liquid/vapor separator; gasoline/water separator; air strippers; granular activated carbon adsorbers; thermal destruction.
- C. Location: At the point of discharge from a pipe at the end of the groundwater treatment system.
Location: Latitude - 30 deg. 58 min. 38 sec.
Longitude - 90 deg. 43 min. 41 sec.
- D. Flow: 0.010 MGD (Average)
- E. Discharge Route: Darling Creek (via an onsite private manmade pond and onsite spray irrigation system).

5. PREVIOUS EFFLUENT LIMITATIONS

Same as Proposed Permit Limits.

6. SUMMARY OF PROPOSED CHANGES (FROM EXISTING LPDES PERMIT)

The only major proposed change from the 2000 LPDES permit in this renewal permit is reducing all Outfall 001 monitoring frequencies from once per week to once per month. This proposed change is based upon the permittee's requested revisions to the existing permit (see 8/30/04 application SCC-2). The permittee requested reducing all Outfall 001 monitoring frequencies from once per week to once per quarter. This Office denies that request. This Office has elected to establish monitoring frequencies of once per month, based upon the current LPDES General Permit LAG940000 (Treated Groundwater, Potentially Contaminated Storm Water and/or Associated Wastewaters from Petroleum-Contaminated Sites, Areas, or Containers) (see the Permit Limit Rationale section below), and the permittee's compliance history with the 2000 LPDES permit. This reduced monitoring frequency is warranted by improvements in environmental conditions at this groundwater remediation site. (The recovery of over 500,000 gallons of gasoline since the 2000 LPDES permit was issued.) Also, the reduced monitoring frequency is appropriate due to the consistent nature of both historical Outfall 001 discharge data and operation of the ground water treatment system.

The permittee's only other permit revision request was to remove Total Lead from this permit's effluent characteristics. This Office has decided to deny removing Total Lead from this permit's effluent characteristics, based upon the parameter being required in the current LPDES General Permit LAG940000 (Treated Groundwater, Potentially Contaminated Storm Water and/or Associated Wastewaters from Petroleum-Contaminated Sites, Areas, or Containers), and the permittee's 2000 LPDES permit. Also, due to the fact that this pipeline (which has, in the past, transported unleaded & leaded gasoline, diesel fuel, and kerosene) was found to be leaking gasoline.

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7. PROPOSED PERMIT LIMITS

The specific effluent limitations and/or conditions will be found in the draft permit. Development of permit limits are detailed in the Permit Limit Rationale section below.

8. PERMIT LIMIT RATIONALE

A. MONITORING FREQUENCIES

Regulations require permits to establish monitoring requirements to yield data representative of the monitored activity [LAC 33:IX.2715/40 CFR 122.48(b)] and to assure compliance with permit limitations [LAC 33:IX.2707.1/40 CFR 122.44(I)]. Specific monitoring frequencies per outfall are listed in Section B.

B. OUTFALL SPECIFIC RATIONALES

Outfall 001

1. General Comments

According to the application, the operation contributing flow is from the discharge of treated groundwater from site remediation.

2. Effluent Limitations, Monitoring Frequencies, and Sample Types

EFFLUENT CHARACTERISTIC Units (Specify)	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	STORET CODE	MONTHLY AVERAGE	DAILY MAXIMUM		MEASUREMENT FREQUENCY (*1)	SAMPLE TYPE
Flow (MGD)	50050	-----	Report		1/month	Estimate
TOC (mg/L)	00680	-----	50		1/month	Grab
Benzene (ug/L)	34030	-----	50		1/month	Grab
Total BTEX (ug/L) (*2)	30383	-----	250		1/month	Grab
Total Lead (ug/L)	01051	-----	50		1/month	Grab
pH Allowable Range (standard units)	00400	-----	6.0 Minimum (*3)	9.0 Maximum (*3)	1/month	Grab

FOOTNOTES:

(*1) When discharging.

(*2) Total BTEX shall be measured as the sum of benzene, toluene, ethylbenzene, ortho-xylene, meta-xylene, and para-xylene, as quantified by EPA Methods 602, 624, 8020, or 8240.

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- (*3) The permittee shall report on the Discharge Monitoring Reports both the minimum and maximum instantaneous pH values measured.

The unit for flow, MGD, is Million Gallons per Day.

The analytical method used must be capable of detecting the limiting concentration.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

The effluent characteristics, discharge limitations, and sample types are referenced to, have been justified, based upon, and retained from the previous LPDES permit LA0110868.

Part II Specific Conditions

PERMIT REOPENER CLAUSE

In accordance with LAC 33:IX.2903, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit; or
3. Require reassessment due to change in 303(d) status of waterbody; or
4. Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP) REQUIREMENT

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all stormwater discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) to be prepared, implemented, and maintained within six (6) months of the effective date of the final permit, along with other requirements. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility. If the permittee maintains other plans that contain

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duplicative information, that plan could be incorporated by reference into the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasure Plan (SPCC), Best Management Plan (BMP), Response Plans, etc.

The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of storm water associated with industrial activity, as defined at LAC 33:IX.2511.B.14 [(40 CFR 122.26(b)(14)].

9. COMPLIANCE HISTORY/COMMENTS

- A. A review of LDEQ records from the time period of 10/20/03 through 10/20/06 was conducted, and **no records of enforcement actions were found during this time frame.**

This site operates in accordance with the requirements of the October 23, 2000 *Consolidated Compliance Order & Notice of Potential Penalty (Enforcement Tracking No. WE-CN-00-0260)*, in response to a release of gasoline from Colonial Pipeline Company's pipeline to groundwater beneath the site, and LPDES permit LA0110868.

- B. The most recent inspection was conducted on 06/15/04. **One issue of concern was noted.**

One notification was made, in response to the June 15, 2004 inspection regarding pH analytical results less than the lower permit limit of 6.0 s.u. (in October 2002).

From January 1, 2002 to July 7, 2004 (112 sampling events), the site reported 6 occurrences when the pH analytical results were less than the lower permit limit of 6.0 s.u.. However, during this timeframe, no discharges were made to waters of the State of Louisiana.

- C. Correspondence sent from the permittee dated 8/10/04 and 10/27/04 was in response to the July 21, 2004 sample result for TOC (60.2 mg/L) exceeding the permit limit (50 mg/L). Analysis of the next week's (July 27, 2004) sample result for TOC (44.1 mg/L) was less than the permit limit. A subsequent QA/QC investigation by the lab revealed that the results for both sample dates were actually 9.5 mg/L each (significantly lower than the permit limit). During this timeframe, no discharges were made to waters of the State of Louisiana.

A DMR review was completed for the period of 10/20/03 through 10/20/06. **The following violations/excursions were noted.**

<u>Date</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Reported Value</u>
5/25/05	001	Total BTEX	250 ug/L Maximum	256 ug/L
10/01/03 to 10/31/03	001	pH	6.0 s.u. Minimum	5.94 s.u.
11/01/03 to 11/30/03	001	pH	6.0 s.u. Minimum	5.79 s.u.

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10. WATER QUALITY CONSIDERATIONS (TMDL WATERBODY)

Subsegment 040301, Amite River – Mississippi State Line to LA Highway 37, is listed on LDEQ's Final 2004 303(d) List as impaired for suspended solids (EPA – Category 5), turbidity (EPA – Category 5), and pathogen indicators (EPA – Category 5). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the pipelines (except natural gas) point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Suspended solids and turbidity have reasoning to be included in the integrated report as impairments due to mine tailings; pathogen indicators, due to on-site treatment systems (septic systems and similar de-centralized systems). These reasons for the impairments listed are not applicable at this site. However, a TMDL is still required to be developed for the impairments listed (for this subsegment). The TMDL projected year of completion (LDEQ due date) is March 31, 2011. The EPA Backstop due date is March 31, 2012.

11. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040301 of the Lake Pontchartrain Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006, from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

12. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

13. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for discharges described in the application.

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14. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the proposed issuance of LPDES individual permits and may request a public hearing to clarify issues involved. This Office's address is on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

A local newspaper of general circulation and
The Office of Environmental Services Public Notice Mailing List.